

EXHIBIT A

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PENNSYLVANIA

JILL BALLARD, REBECCA VARNO,
and MARK POKORNI on behalf of
themselves and the class members
described herein,

Plaintiffs,

Civil No.

vs.

3:18-cv-00121-MEM-MCC

NAVIENT CORPORATION,
NAVIENT SOLUTIONS, INC., and
NAVIENT SOLUTIONS, LLC,

Defendants.

Deposition of JEFFREY A. STINE

June 24, 2022

Misty Klapper, RMR, CRR and Notary Public.
484458



(310) 207-8000 Los Angeles	(415) 433-5777 San Francisco	(949) 955-0400 Irvine	(858) 455-5444 San Diego
(310) 207-8000 Century City	(408) 885-0550 San Jose	(760) 322-2240 Palm Springs	(800) 222-1231 Carlsbad
(916) 922-5777 Sacramento	(800) 222-1231 Martinez	(702) 366-0500 Las Vegas	(800) 222-1231 Monterey
(951) 686-0606 Riverside	(818) 702-0202 Woodland Hills	(702) 366-0500 Henderson	(516) 277-9494 Garden City
(212) 808-8500 New York City	(347) 821-4611 Brooklyn	(518) 490-1910 Albany	(914) 510-9110 White Plains
(312) 379-5566 Chicago	00+1+800 222 1231 Paris	00+1+800 222 1231 Dubai	00+1+800 222 1231 Hong Kong

1 billing that person in the same amount as the IDR
2 plan amount until that application is processed,
3 regardless of when the processing occurs; is that
4 right?

5 A. That's correct.

6 Q. Now, I want to talk about
7 forbearances and specifically hardship
8 forbearances.

9 When -- what are they and when are
10 they typically used?

11 A. So the hardship forbearance, I mean,
12 that's not a terminology necessarily that we
13 would utilize. We have discretionary
14 forbearances that are offered and issued to
15 customers who are experiencing a financial
16 hardship.

17 Is that what you're referring to
18 here?

19 Q. Yeah. I have seen in the records a
20 lot of references to a forbearance related to
21 financial hardship. So I was using that language
22 to the extent that it's in the records. But if
23 it's easier to call it a discretionary hardship
24 forbearance I'll do that.

25 So, yeah, I'm just trying to get a